

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

CHRISTINE M. GRIFFIN

Debtor

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M & T BANK

Movant

v.

CHRISTINE M. GRIFFIN

Respondent

Case No. 5-19-03415

Chapter 13

Henry W. Van Eck, C.B.J.

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**DEBTOR'S REPLY TO MOTION COMPEL**

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AND NOW, comes the Debtor herein by and through her attorney, Brian E. Manning Esquire, and files the following Reply to the Motion to Compel and in support thereof alleges:

1. The Debtor has prepared a status report regarding the property a copy of which is attached hereto, made a part hereof and marked as Exhibit "A".
2. Debtor and M & T Bank entered into a Stipulation in July of 2020. The Bank was aware the property was unoccupied at that time and at all times relevant hereto.
3. Debtor submits that this response should satisfy, and render moot the instant Motion to Compal.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion to Compel as moot, and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
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Attorney for the Debtor

Dated: February 24, 2022

Gerald and Christine Griffin  
289 Ringtown Blvd  
Ringtown PA 17967  
Case# 19-03415  
Property Protection Measures

As was established during the Chapter 13 Bankruptcy proceeding, the home construction was never completed therefore no CO can be issued thereby preventing occupancy. The home is and has been vacant at all times.

The following measures are in place to ensure that our property is protected and maintained within our capabilities.

- Daily visits and inspection of the property and structure; inside and outside.
- Gate installed on the entry road to the property is double padlocked.
- Security lights and cameras run 24/7; motion activated.
- The entry doors and windows on the main floor are locked. Windows are covered with plastic sheeting and/or plywood to block view of property contained within and to inhibit entry.
- Entry points where doors are not yet installed are secured with plywood covering the entire opening, secured with construction screws.
- Groundskeeping is maintained at least weekly during the growing season including mowing and trimming.
- Rodent traps are utilized as needed.
- Neighbors are vigilant to any unauthorized people on the property and have our phone contact information.
- The property is insured.
- Property taxes are paid in a timely manner.

Exhibit "A"